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Celgene Corporation*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CELGENE CORPORATION,

Plaintiff,

v.

**HETERO LABS LIMITED, HETERO
LABS LIMITED UNIT-V, HETERO
DRUGS LIMITED, HETERO USA, INC.,
AUROBINDO PHARMA LIMITED,
AUROBINDO PHARMA USA, INC.,
AUROLIFE PHARMA LLC, EUGIA
PHARMA SPECIALTIES LIMITED,
APOTEX INC., APOTEX CORP., MYLAN
PHARMACEUTICALS, INC., MYLAN
INC., MYLAN, N.V., BRECKENRIDGE
PHARMACEUTICAL, INC., and TEVA
PHARMACEUTICALS USA, INC.,**

Defendants.

Civil Action No. 17-3387 (ES)(MAH)

**NOTICE OF JOINT MOTION TO SEAL
CERTAIN MATERIALS PURSUANT TO
L. CIV. R. 5.3**

(Filed Electronically)

PLEASE TAKE NOTICE that on March 18, 2019, or as soon thereafter as counsel may be heard, Plaintiff Celgene Corporation (“Celgene”) and Defendants Hetero Labs Limited, Hetero Labs Limited Unit-V, Hetero Drugs Limited, Hetero USA, Inc., Aurobindo Pharma Limited, Aurobindo Pharma USA, Inc., Aurolife Pharma LLC, Eugia Pharma Specialties Limited, Apotex Inc., Apotex Corp., Mylan Pharmaceuticals, Inc., Mylan Inc., Mylan, N.V., Breckenridge Pharmaceutical, Inc., and Teva Pharmaceuticals USA, Inc. (collectively,

“Defendants”) will move before the Honorable Michael A. Hammer, U.S.M.J., at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for the entry of an Order pursuant to Local Civil Rule 5.3(c) sealing certain portions of: (1) Liza M. Walsh’s November 29, 2018 Letter to Judge Hammer and associated exhibits (D.I. 255-56), (2) Charles M. Lizza’s January 4, 2019 Letter to Judge Hammer (D.I. 268), and (3) Liza M. Walsh’s January 17, 2019 Letter to Judge Hammer and associated exhibits (D.I. 276-77).

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Celgene shall rely upon the accompanying certification of Sarah A. Sullivan.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith for the Court’s consideration.

Dated: February 14, 2019

By: s/ Sarah A. Sullivan
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